

VICTOR M. SHER (SBN 96197)
vic@sheredling.com
MATTHEW K. EDLING (SBN 250940)
matt@sheredling.com
STEPHANIE D. BIEHL (SBN 306777)
stephanie@sheredling.com
TIMOTHY R. SLOANE (SBN 292864)
tim@sheredling.com
SHER EDLING LLP
100 Montgomery St., Ste. 1410
San Francisco, CA 94104
Tel.: (628) 231-2500
Fax: (628) 231-2929

Attorneys for Plaintiff Sacramento Suburban Water District

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

SACRAMENTO SUBURBAN WATER
DISTRICT,

Plaintiff,

v.

THE 3M COMPANY (F/K/A MINNESOTA
MINING AND MANUFACTURING CO.),
E. I. DU PONT DE NEMOURS AND
COMPANY, THE CHEMOURS COMPANY,
and DOES 1 through 10,

Defendants.

Case No. 2:22-cv-01005-CKD

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND TO MOTIONS TO DISMISS**

Motions to dismiss served: August 15, 2022
Current response date: August 29, 2022
New response date: September 1, 2022

Presiding Judge: Hon. Carolyn K. Delaney

1 Plaintiff Sacramento Suburban Water District (“Plaintiff”), on the one hand, and
2 Defendants 3M Company, E. I. du Pont de Nemours and Company, and The Chemours Company
3 (“Defendants”), on the other hand, hereby stipulate to and request an order setting a briefing
4 schedule on Defendants’ pending motions to dismiss.

5 *Whereas*, Defendants filed two motions to dismiss the complaint in this action on August
6 15, 2022 (ECF Nos. 8, 9 (“Motions”));

7 *Whereas*, pursuant to Local Rule 230(c), Plaintiff’s oppositions to the Motions are due on
8 August 29, 2022;

9 *Whereas*, a hearing is set on the Motions for October 5, 2022;

10 *Whereas*, Plaintiff will benefit from a short, three-day extension of the deadline to prepare
11 its oppositions to the Motions;

12 *Whereas*, the Parties wish to set a date certain deadline for Defendants’ replies in support
13 of the Motions;

14 *Whereas*, the Parties do not seek a continuance of the scheduled hearing on the Motions;

15 *Whereas*, the Parties have conferred in writing and all Parties consent to the proposed
16 briefing schedule set forth below;

17 *Whereas*, the Parties further agree the instant Stipulation is without prejudice to
18 Defendants’ challenge to the exercise of personal jurisdiction over Defendants in this Court.

19 *Now, Therefore, It is Stipulated and Agreed that* Plaintiff’s opposition to Defendants’
20 Motions shall be due on September 1, 2022; and Defendants’ replies in support the Motions shall
21 be due on September 15, 2022.

22 IT IS SO ORDERED.

23 Dated: August 18, 2022

24 
25 CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE

27 8.sswd.36stip
28

1 Stipulated to:

2 Dated: August 17, 2022

By: /s/ Timothy R. Sloane
VICTOR M. SHER (SBN 96197)
MATTHEW K. EDLING (SBN 250940)
STEPHANIE D. BIEHL (SBN 306777)
TIMOTHY R. SLOANE (SBN 292864)
SHER EDLING LLP
100 Montgomery St. Ste. 1410
San Francisco, CA 94104
Tel.: (628) 231-2500
vic@sheredling.com
matt@sheredling.com
stephanie@sheredling.com
tim@sheredling.com

10 *Attorneys for Plaintiff*
11 *Sacramento Suburban Water District*

13
14 Dated: August 17, 2022

By: /s/ Adam M. Rapp (as authorized on 08/17/22)
ANDREW T. MORTL (SBN 177876)
ADAM M. RAPP (SBN 280824)
**GLYNN, FINLEY, MORTL, HANLON &
FRIEDENBERG, LLP**
One Walnut Creek Center
100 Pringle Avenue, Suite 500
Walnut Creek, CA 94596
Tel.: (925) 210-2800
amortl@glynnfinley.com
arapp@glynnfinley.com

21 *Attorneys for Defendants*
22 *E. I. du Pont de Nemours and Company and*
The Chemours Company

23 Dated: August 17, 2022

MAYER BROWN LLP

24 By: /s/ J. Tom Boer (as authorized on 08/17/22)
25 J. Tom Boer, (SBN 199563)
26 **HOGAN LOVELLS LLP**
27 3 Embarcadero Center, Suite 1500
28 San Francisco, CA 94111
Tel.: (415) 374-2336
tom.boer@hoganlovells.com

Dan Queen (SBN 292275)
MAYER BROWN LLP
350 South Grand Avenue, 25th Floor
Los Angeles, CA 90071
Tel.: (213) 229-9500
DQueen@mayerbrown.com

Attorneys for Defendant 3M Company